

THE LAW OFFICES OF

Special | Hagan

88-08 JUSTICE AVENUE APT. 16I
ELMHURST, NEW YORK 11373
P: (917) 337-2439
SPECIAL@HAGANLAWOFFICES.NET

Monday, May 22, 2023

Honorable Judge Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1105
New York, New York 10007

RE: Molina v. John Jay Institute for Justice and
Opportunity/CUNY et. al.
23-CV-1493(JMF)

Dear Honorable Judge Furman:

I am counsel for Plaintiff, Juan Molina aka John Molina, in the above-captioned matter. Earlier today, I spoke to Mr. Lawrence and Mr. Moro, counsel for the named defendants. As a courtesy, Plaintiff has agreed to their requests for extensions to file their respective answers. However, Plaintiff would still like for the parties to appear at the scheduled initial conference on June 13, 2023.

Plaintiff respectfully submits that he would like to amend his complaint, and by that time it is his position that Defendants should be able to establish representation. It is also Plaintiff's hope that pursuant to Fed. R. Civ. P. 16(f) the parties should be able to put a Scheduling Order in place, and that they will be able to agree to a date for the production of initial disclosures pursuant to Fed. R. Civ. P. 26(a). Accordingly, Plaintiff maintains that the June 13th Conference should resolve some preliminary issues and should proceed as scheduled.

Respectfully submitted,

/s/

Special Hagan, Esq.
Attorney for Plaintiff, Juan Molina